



Eric J. Holcomb, Governor  
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**Indiana Department of Child Services**

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December 8, 2021

To: [infocollection@acf.hhs.gov](mailto:infocollection@acf.hhs.gov)

RE: [OMB #0970-0529], Proposed Information Collection Activity; Prevention Services Data Collection

To Whom It May Concern,

In review of OMB #0970-0529, the Indiana Department of Child Services respectfully submits public comments on the following:

- (a) whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility.
  - AFCARS 2020 collection starts on Oct. 1, 2022, and requires a major overhaul on the reporting of data. The DCS team that oversees IV-E Prevention data submission is responsible for working on the changes to AFCARS 2020. A delay in the IV-E prevention plan data submission requirements would alleviate capacity constraints and allow smoother performance of key responsibilities related to federal data reporting efforts.
  - Additionally, Indiana DCS is in the middle of transitioning to a Comprehensive Child Welfare Information System (CCWIS) and is in the process of restructuring race and ethnicity data points in certain modules to match DCS and federal mapping requirements to ensure accurate comparison. These changes will help us better identify and address disproportionality in the child welfare system.
- (b) the accuracy of the agency's estimate of the burden of the proposed collection of information.
  - Until the CCWIS system is complete (targeting completion of phase two in 2024), DCS will have to piece data elements together from multiple sources, making data more vulnerable to errors and creating complex tasks that will increase the burden of collecting information. This will necessarily increase the estimate of the burden, which does not currently reflect the required work hours of DCS should the prevention plan data elements go into effect as originally planned.
- (c) the quality, utility, and clarity of the information to be collected.
  - DCS is working to determine allowable reimbursement costs of a IV-E eligible service since the prevention plan and allowable services have not yet been approved by ACF (the clarity of the information is still unknown).
  - IV-E Prevention data elements currently do not have validation rules. While common sense, other similar reporting systems, and improvement plans can be used to determine these validations, having no rules allows states to have very different interpretations that may not always be identified in each states' data mapping.



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(d) ways to minimize the burden of the collection of information on respondents, including using automated collection techniques or other forms of information technology.

- When Indiana is CCWIS-compliant, data-exchange efforts will be easier to manage and will be based on comprehensive business rules that minimize the burden on the collection of the information. However, this effort will not conclude until 2024.

Sincerely,



Terry J. Stigdon, MSN, RN  
Director  
Indiana Department of Child Services



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